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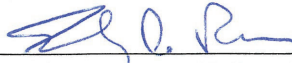DATE FILED: _9/29/2021_

DOAR RIECK KALEY & MACK
ATTORNEYS AT LAW

9/29/2021

JOHN DOAR (1921-2014)
WALTER MACK

OF COUNSEL
JOHN JACOB RIECK, JR.
JOHN F. KALEY
DAVID RIVERA
MICHAEL MINNEFOR

The application is _X_ granted
_____ denied

_____
Edgardo Ramos, U.S.D.J
Dated: _9/29/2021_____
New York, New York

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September 27, 2021

By ECF Filing
Hon. Edgardo Ramos
United State District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Robinson* – S1 20 Cr. 461 (ER)

Dear Judge Ramos:

I represent Kenneth Robinson in the above-referenced matter. On September 9, 2021, Your Honor sentenced Mr. Robinson, *inter alia*, to incarceration for 30 months and set November 9, 2021 as the date for Mr. Robinson to surrender to the facility to be designated by the Bureau of Prisons. I write now to request a modification to Mr. Robinson's bail conditions to eliminate the electronic monitoring condition of his bail conditions. Mr. Robinson is on bail and not in custody, and has been compliant with all of the conditions of his bail since the date of his arrest. The reason for this request is that Mr. Robinson is trying to put his affairs in order before his incarceration, earn some additional money through work and have some further personal time with his children before reporting for service of his sentence.

I have communicated by email with AUSA Peter Davis, who advised me that the Government has no objection to the adjournment requested. Pretrial Services Officer Leo Barrios has advised that Pretrial Services has no objection to the requested modification.

Thank you for the Court's consideration of this request.

Respectfully submitted,

/s/
John F. Kaley

cc: AUSA Peter Davis
    U.S. Probation Officer Leo Barrios
    (via email and ECF filing)